

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VALMIKI Raman

Write the full name of each plaintiff.

23-CV-4596

(Include case number if one has been assigned)

-against-

C D Baby

5925 NE 80 Ave

Portland

Oregon 97218

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

COMPLAINT

Do you want a jury trial?

Yes No

*See attached
complaint
and*

Discovery File

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question
 Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

THEFT of Intellectual Property
To profit from there of

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, C D Baby, is incorporated under the laws of
the State of Oregon and New Jersey
and has its principal place of business in the State of 925 NE 80 Ave Portland OR 97218
or is incorporated under the laws of (foreign state) _____
and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Valmiki

J

Ramani

First Name

Middle Initial

Last Name

139-05 85 DR APR 60

Street Address

Briarwood

NY

11435

County, City

State

Zip Code

718-291-2978

Telephone Number

Email Address (if available)

valmiki.d.r@gmail.com

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

<u>CD Baby</u>	First Name	Last Name
<u>Distributions of Music</u>		
Current Job Title (or other identifying information)		
<u>59 25 NE 80 Ave</u>		
Current Work Address (or other address where defendant may be served)		
<u>Portland</u>	<u>Oregon</u>	<u>97218</u>
County, City	State	Zip Code

Defendant 2:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 3:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 4:

First Name _____ Last Name _____

Current Job Title (or other identifying information) _____

Current Work Address (or other address where defendant may be served) _____

County, City _____ State _____ Zip Code _____

III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City

Date(s) of occurrence: July 2020

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant was employed to distribute musical work of Plaintiff, L world wide in stores and various platforms, except as Plaintiff stated, not to YouTube
(See attached Discovery)

Defendant, violated and breached agreement and gave a song to YouTube, that they wanted so that they may promote through advertisement on said song for the platforms of

TICK TOK

~~Sat~~ See attached discovery file

This constitute breach of contract
theft of intellectual property for
company's gain.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am asking the court to award
me the sum of \$75,000.01
for stated claim(s)

Valmiki Raman
Plaintiff
CD Baby
Defendant

Complaint

①

After YouTube took over my music video channel, my brother in Canada supported me in trying to sell my music digitally on line stores and platforms. The first choice was DITTO Music after taking my money and six songs, two weeks later they locked me out of my account and went on to exploit my music to their advantage. They had two of my songs on YouTube who were putting advertising on them, I turned to President Trump help to have the songs removed and they were.

②

Then I turned to CD Baby paid them to distribute to their available stores and platforms, and made it clear I did not want my material on YouTube, so I never ticked off YouTube on CD Baby Selection stores platforms, as can be seen in the Discovery file CD Baby proved to be very dishonest (see discovery file).

③

Then I learned that they had defied me in

①

in the worst way. They gave my song
titled Don't to YouTube who in
turn used it to put ads for
TICK TOCK, see Discovery file.
Eventually, I withdrew all my singles
and albums, and got CD Baby to
pull back my Song, Don't from YouTube.

I am seeking \$75,000 in compensation
and Punitive from the defendant
for Committing Fraud, Breach of
Contract, Theft of Intellectual Property
and Soliciting of such.

Defendant

CD Baby (new address) Valmiki Ramon
5925 NE 80 Ave Plaintiff
Portland Valmiki Ramon
Oregon 97218 139-05 85 DR
DPT GD

Barkwood NY 11435

Email: Valmiki.r@Gmail.com

(2)

Index No:

DISCOVERY

Vimaliki Ramani

Plaintiff

against

CJ Baby

Defendant

don't valmiki ramani



Up!

Tik
For

Ma
mi
ter

Don't

9 views • Jul 22, 2020

SHARE

SAVE

SUBSCRIBE



Download as PDF

don't valmiki ramani



Something wrong with the email? View it in your browser.

You're receiving this email because you made a purchase at DistroKid, which partners with Stripe to provide invoicing and payment processing.

Some things wrong with the email? View it in your browser.

You're receiving this email because you made a purchase at DistroKid, which partners with Stripe to provide invoicing and payment processing.

Without my consent that is. Will you give me a refund? I will go into my account as it's your piggy bank and take money out without my consent that is. I will go into my account as it's your piggy bank and take sales that were shown in the cost incurred when you run a business. You supposed to supply an invoice would be deducted from sales. When you run a business, you run a business. When you run a business, you run a business.

When I signed up there was like \$19.99 and \$1 per month maintenance cost per song, and there was the money that

Mon, May 18, 2020 at 3:21 PM

To: DistroKid <support@distrokid.com>

Valmiki Ramani <valmiki.d.r@gmail.com>

This email is a service of DistroKid. Delivery | Zendesk | Privacy Policy

TikTok
For Business

Make videos in minutes with easy tools and step-by-step guides.

parallel request, as

Don't

Thanks for reaching out to DistroKid! This is an automated message to let you know that we have received your email, and are working hard to reply as soon as possible.

Please type your reply above this line

Mon, May 18, 2020 at 2:46 PM

To: Valmiki Ramani <valmiki.d.r@gmail.com>

Reply-To: DistroKid <support@distrokid.com>

DistroKid <support@distrokid.com>

NEVER authorize the release to
this song on youtube
as you can see they fund ads
And there is no income

Your maintenance fee is \$1 per song per month.

Valmiki.

explain!

Mon, May 18, 2020 at 2:46 PM

To: Valmiki Ramani <valmiki.d.r@gmail.com>

Valmiki Ramani <valmiki.d.r@gmail.com>

Floss it for me!

with Stripe to provide invoicing and payment processing.

You're receiving this email because you made a purchase at DistroKid, which partners with Stripe to provide invoicing and payment processing.

Something wrong with the email? View it in your browser.

Download as PDF



SUPPORT

ACCOUNT SETTINGS ▾

LOG OUT



cdbabystore.com

TERMS OF SERVICE

DETAILED TRACK INFO

TRACK INFORMATION

GENRES/LOCATION/SOUNDS LIKE

DISTRIBUTION

ISRC

DD OPTIONS

TERRITORY RESTRICTIONS

LICENSING

SYNC LICENSING

UPLOAD AND CHECKOUT

SUBMIT ARTWORK

SUBMIT AUDIO

TITLE OVERVIEW

Downloads + Streaming services

Includes all download partners, plus streaming services like Spotify, Apple Music, Pandora, YouTube Music, Deezer, and more

Downloads Only

Includes only stores that sell downloads of your music and does not include streaming services that provide users with access to tracks they haven't purchased or previously owned. This will not include services like Spotify, YouTube, or Apple Music.

Do it all Even unpaid.

Includes places that offer free downloads and streaming.

If you do not want to sell your music to a specific company, uncheck its box.

- | | |
|---|---|
| <input checked="" type="checkbox"/> 24-7 | <input checked="" type="checkbox"/> 7digital |
| <input checked="" type="checkbox"/> Amazon Music | <input checked="" type="checkbox"/> Anghami |
| <input checked="" type="checkbox"/> Apple iTunes | <input checked="" type="checkbox"/> AWA |
| <input checked="" type="checkbox"/> Boomplay | <input checked="" type="checkbox"/> Deezer |
| <input checked="" type="checkbox"/> Hungama | <input checked="" type="checkbox"/> iHeartRadio |
| <input checked="" type="checkbox"/> iMusica | <input checked="" type="checkbox"/> InProdicon |
| <input checked="" type="checkbox"/> KDigital | <input checked="" type="checkbox"/> KKBox |
| <input checked="" type="checkbox"/> Kuack | <input checked="" type="checkbox"/> Line Music |
| <input checked="" type="checkbox"/> MediaNet | <input checked="" type="checkbox"/> Napster |
| <input checked="" type="checkbox"/> Napster (2008-2012) | <input checked="" type="checkbox"/> NetEase Cloud Music |
| <input checked="" type="checkbox"/> Pandora | <input checked="" type="checkbox"/> Qobuz |
| <input checked="" type="checkbox"/> Resso | <input checked="" type="checkbox"/> Saavn |
| <input checked="" type="checkbox"/> Shazam | <input checked="" type="checkbox"/> Slacker Radio |
| <input checked="" type="checkbox"/> SoundExchange | <input checked="" type="checkbox"/> Spotify |
| <input checked="" type="checkbox"/> Tencent Music Entertainment (TME) | <input checked="" type="checkbox"/> Tidal |
| <input checked="" type="checkbox"/> United Media Agency (UMA) | <input checked="" type="checkbox"/> TikTok |
| <input checked="" type="checkbox"/> Yandex | <input type="checkbox"/> YouTube Music & Google Play |

Always exclude
YouTube and Google Play
The intentionally let this
one song go on YouTube title
Don't

To make a payment by mail, insert the top portion in the enclosed envelope. Be sure the mailing address shows through the envelope window.

MERRICK ACCOUNT SUMMARY

An amount with a minus sign (-) is a credit unless otherwise indicated.

Account Number 4120 6180 4884 3854
Billing Cycle Closing Date 08/11/20

Summary of Account Activity		
Previous Balance		\$2,438.48
Payments	-	\$307.00
Other Credits	-	\$19.06
Purchases	+	\$381.98
Cash Advances	+	\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$40.67
 New Balance		 \$2,535.07
 Past Due Amount		 \$0.00
Credit Limit		\$2,500.00
Available Credit		None
Days in Billing Cycle		32

Customer Service 1-800-253-2322. Our office hours are 24/7.

Payment Information

New Balance	\$2,535.07
Minimum Payment Due	\$67.00
Payment Due Date	09/05/20

Late Payment Warning:

If we do not receive your minimum payment by the date listed above, you may have to pay a late fee up to \$40.00.

Minimum Payment Warning:

If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	10 years	\$5,159
\$94	3 years	\$3,366 <i>(Savings = \$1,793)</i>

If you would like information about credit counseling services, call 1-877-316-6322.

Transactions, Payments and Credits

Trans Date	Item Description	Amount
07/10	2449215JHRTSJLF5	25.10
07/10	2469216JG2XEJ3XQ4	14.95
07/11	2469216JH2X6VJS7E	14.95
07/11	2469216JH2X6VJT8R	14.95
07/13	7412061JJ00XTMJGS	45.00
07/13	2445388JL000G66GM	26.09
07/13	7412061JK00XTMJGT	50.00
07/14	2445388JM000G79HV	26.09
07/14	2469216JL2X548ARD	14.95
07/14	7412061JL00XTMJGR	20.00
07/15	2469216JM2XSADS7B	14.95
07/16	F554900JV000Q0044	20.00
07/16	7412061JN00XTMJGN	20.00
07/17	2445388JR000GJB90	26.09
07/17	2469216JP2XBN3Y4Q	14.95
07/19	7412061JT00XTMJGV	72.00
07/21	2445388JW000GWHFN	23.54
07/22	2469216JW2XKD3YRD	14.95
07/23	2469216JX2X9ZXB69	14.95
07/23	7412061JX00XTMJGP	10.00
07/24	7412061JY00XTMJGN	50.00
07/25	2445388K0000HAVPO	23.54
07/26	2469216K02XQTEA7Q	14.95
07/27	7412061K100XTMJGX	30.00
07/28	2445388K3000HHPBV	23.54
07/28	7412061K200XTMJGS	10.00
07/29	2469216K32XQSAKM0	14.95
07/29	2469216K32XQSANFG	14.95
07/30	F554900K4000CE740	18.99
07/30	F554900K4000MF740	0.02
07/31	2445388K6000HSY5W	23.54
08/07	F554900KC000MF740	0.05
Fees		
TOTAL FEES FOR THIS PERIOD		0.00
Interest Charged		
Interest Charge on Purchases		40.67
Interest Charge on Cash Advances		0.00
TOTAL INTEREST FOR THIS PERIOD		40.67



Valmiki Ramani <valmiki.d.r@gmail.com>

CD Baby Purchase Confirmation

1 message

CD Baby <no-reply@cdbaby.com>
 To: valmiki.d.r@gmail.com

Mon, May 3, 2021 at 1:27 AM

CD Baby Purchase Confirmation

Hello valmiki,

We've received your order! Here is your order confirmation number for safe keeping:

SO07312181

For your Standard Submission: Songs of 50th State

We're excited to help you spread your music far and wide, but before we can, make sure you have completed all the various sections of the submission process - from uploading cover art to selecting distribution territories. Not sure if you've completed all the required fields? You can check the status from your CD Baby Members Account by clicking "View/Edit" next to your title.

IMPORTANT: After you click "Submit for distribution," our inspectors will take a look. Once you submit for distribution, that may be the last time you'll be able to make edits so make sure it's your final product. If the inspectors find any issues preventing your music from being distributed, they will email you with further instructions. If your submission is approved by our inspectors, we will immediately begin delivering your music to our digital partners and you will receive a confirmation email. That's it! We're ready to bring your music to the world.

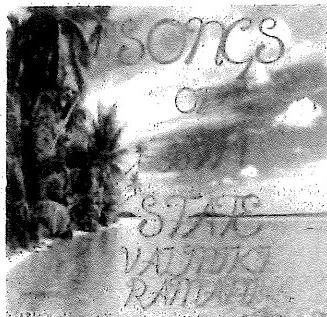
IMPORTANT: If you've ordered Standard, or Pro distribution

We cannot begin distributing or selling your music until you've told us you're ready. To do so, please complete all the information on the Title Overview page in your account, then click "Submit for distribution."

Thank you so much for your support and feel free to Visit our Help Center if you have any questions.

ITEM	DESCRIPTION	CREDIT APPLIED	PRICE
	Songs of 50th State		

Songs of 50th State



cd baby

Artist Name
 [Valmiki Ramani](#)

Record Label
 Vrisol,Tm

UPC
 617308722628

Primary Genre
 Easy Listening

Primary Subgenre
 Love Songs

Mood/Style
 Mood:Dreamy

Artist Sounds Like
 Add Info

Release Date
 5/13/2020

Secondary Genre
 Easy Listening

Secondary Subgenre
 Love Songs

Album Language
 English

Artist Location
 United States - NY - New York City

CD BABY STANDARD

Submission Complete

SERVICE AGREEMENTS >

RELEASE REQUIREMENTS

PAID

INSPECTION ②

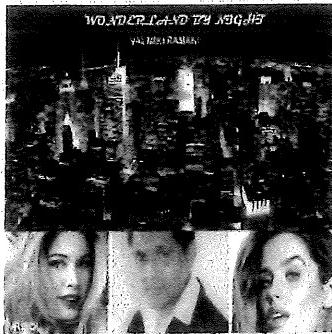
PARTNER DELIVERY >

[mDetails/BasicAlbumInfo.aspx](#)  [AUDIO >](#)

 Let's review your

Wonderland by Night

**Artist Name** Valmiki Ramani**Record Label** Vrisol,Tm**UPC** 617308722635**Release Date** 5/8/2020**Submission Complete****Primary Genre** Easy Listening**Primary Subgenre** Easy Pop**Secondary Genre** Easy Listening**Mood/Style** Mood: Dreamy**Artist Sounds Like** Add Info**Secondary Subgenre** Easy Pop**Album Language** English**Artist Location** United States - New York SERVICE AGREEMENTS > RELEASE REQUIREMENTS PAID INSPECTION (?)

Love Me with All of Your Heart



Artist Name

 Valmiki Ramani

Record Label

 Vrisol,Tm

UPC

 617308722642

Release Date

 5/13/2020

Submission Complete

Primary Genre

 Easy Listening

Secondary Genre

 Easy Listening

Primary Subgenre

 Easy Pop

Secondary Subgenre

 Love Songs

Mood/Style

 Mood: Dreamy

Album Language

 English

Artist Sounds Like

 Add Info

Artist Location

 United States - New York SERVICE AGREEMENTS RELEASE REQUIREMENTS PAID INSPECTION

Let's re



Valmiki Ramani <valmiki.d.r@gmail.com>

CD Baby Purchase Confirmation

1 message

CD Baby <no-reply@cdbaby.com>
 To: valmiki.d.r@gmail.com

Thu, May 6, 2021 at 1:31 AM

CD Baby Purchase Confirmation

Hello valmiki,

We've received your order! Here is your order confirmation number for safe keeping:

SO07317473

For your Standard Submission: Love Me with All of Your Heart

We're excited to help you spread your music far and wide, but before we can, make sure you have completed all the various sections of the submission process - from uploading cover art to selecting distribution territories. Not sure if you've completed all the required fields? You can check the status from your CD Baby Members Account by clicking "View/Edit" next to your title.

IMPORTANT: After you click "Submit for distribution," our inspectors will take a look. Once you submit for distribution, that may be the last time you'll be able to make edits so make sure it's your final product. If the inspectors find any issues preventing your music from being distributed, they will email you with further instructions. If your submission is approved by our inspectors, we will immediately begin delivering your music to our digital partners and you will receive a confirmation email. That's it! We're ready to bring your music to the world.

IMPORTANT: If you've ordered Standard, or Pro distribution

We cannot begin distributing or selling your music until you've told us you're ready. To do so, please complete all the information on the Title Overview page in your account, then click "Submit for distribution."

Thank you so much for your support and feel free to Visit our Help Center if you have any questions.

ITEM	DESCRIPTION	CREDIT APPLIED	PRICE
	Love Me with All of Your Heart		

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>6-1-23</u>	<u>Valmiki Raman</u>		
Dated	Plaintiff's Signature,		
<u>VALMIKI</u>	<u>D</u>	<u>Raman</u>	
First Name	Middle Initial	Last Name	
<u>139-05</u>	<u>85DR</u>	<u>Apt 6D</u>	
Street Address	NY	11435	
County, City	State	Zip Code	
<u>714-291-2978</u>		<u>valmiki.d.r@gmail.com</u>	Email Address (if available)
Telephone Number			

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.